



September 17, 2021

Ms. Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: California Air Resources Board (CARB) Harbor Craft Rule

Dear Chair Randolph and Commissioners:

On behalf of the many Ventura Harbor businesses, residents, and visitors that are directly or indirectly dependent upon marine vessels, I request your consideration of several major impacts that would result from the proposed Harbor Craft Rule. Some considerations relevant to this request include:

Business Impacts:

- The proposed regulations are believed to place such a significant financial burden on small businesses that many operators are expected to close and lay off staff.
- Technology to meet this standard does not exist for some vessels. In other cases, the required modifications are financially or structurally infeasible or unsafe.
- Even if achievable with some vessels, CARB's proposed solution would reduce passenger load and necessitate increased ticket prices.
- New watercraft that will meet the proposed standards would likely be larger and/or less efficient with regard to passenger count likely resulting in no net reduction in emissions per passenger. Larger vessels could also require significant shoreside infrastructure changes to accommodate.
- Demand for construction of new vessels or repowering of existing vessels would create a significant concern related to shipyard availability to meet the deadline.
- All of the passenger vessel operators in Ventura Harbor are privately owned and operated thus not currently eligible for grants and subsidies to upgrade, so the costs will be passed on to the public.

Public Impacts:

- Many of the affected vessels include those that provide opportunities for the public to go on the water for such activities as transportation, whale watching, and sport fishing. These services provide the public the opportunity to enjoy these experiences without owning their own boats.
- In particular this bill could terminate the only public passenger service to the Channel Islands National Park. In 2020, over 167,000 people visited the National Park. Most of these passengers travel via Island Packers privately operated ferry service contracted by the National Park Service.

- Sport fishing across the state, which not only provides a public amenity, but also allows many to put food on the table, would likely not survive the implementation of this proposed standard.

California's maritime community and economy is critical to the future of our State. I urge the CARB Board to conduct further engagement and work closely with the maritime industry on viable solutions that will achieve emissions reductions while preserving our coastal communities, working waterfronts, and maintain affordable access to our ocean waters.

Sincerely,



Brian D. Pendleton
General Manager

CC: CARB Board Members
Board of Port Commissioners
Monique Limón, State Senator, District 19
Steve Bennett, State Assemblymember, District 37